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6 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

7 EDWARD B. DOUGLAS, an individual

Case No. 2:17-cv-02134-APG-PAL

8 Plaintiff,

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME TO FILE
RESPONSES TO MOTIONS FOR
SUMMARY JUDGMENT**

9 v.

(Second Request)

10 DREAMDEALERS USA, LLC d/b/a Exotics
Racing, a Nevada limited liability company,
11 DAVID PERISSET, an individual, and
ROMAIN THIEVIN, an individual,

12 Defendants.

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14 In accordance with Federal Rule of Civil Procedure 16(b)(4), LR IA 6-1, LR IA 6-2, LR
15 7-1, and LR 26-4, Plaintiff, EDWARD B. DOUGLAS (“Plaintiff”), and Defendants,
16 DREAMDEALERS USA, LLC, DAVID PERISSET, and ROMAN THIEVIN (collectively
17 “Defendants”), hereby agree and stipulate to extend the time for Plaintiff and Defendants to file
18 responses in opposition to the counter-motions for summary judgment (ECF Nos. 31-32) from
19 the current deadline of December 20, 2018 up to and including December 28, 2018. This is the
20 second stipulation for extension of time to file responses in opposition to the counter-motions for
21 summary judgment. The parties’ respective motions for summary judgment (ECF Nos. 31-32)
22 were filed on November 15, 2018.

23 Good cause exists to grant this stipulation and extend the response deadline to Friday,
December 28, 2018. In particular, Plaintiff’s legal counsel is dealing with ongoing health issues

1 that have been especially acute since early December 2018. Additionally, legal counsel for
2 Plaintiff has been out of the office at times during this month for medical tests. Because of the
3 personal nature of the illness, Plaintiff's counsel prefers not to detail his condition in this
4 stipulation but is willing to provide a declaration in support hereof for in-chambers review or
5 under seal if the Court so desires.

6 DATED: December 20, 2018

DATED: December 20, 2018

7 Respectfully submitted,

Respectfully submitted,

8 CLARK LAW COUNSEL PLLC

LITTLER MENDELSON, P.C.


9 /s/ Dustin L. Clark

/s/ Wendy M. Krincek

10 Dustin L. Clark
Attorney for Plaintiff

Wendy M. Krincek
Marcus B. Smith
Attorney for Defendants

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13 IT IS SO ORDERED.

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16 UNITED STATES DISTRICT JUDGE
Dated: December 20, 2018.